

FILED

DEC 10 2019

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS OFFICE

UNITED STATES OF AMERICA,)

Plaintiff,)

vs.)

EARL G. RICE, JR.,)

Defendant.)

CRIMINALNO. 19-30167-SMY

Title 18, United States Code,
Sections 2251(a), 2253, 2422(b)
and 2423(b).

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

ENTICEMENT OF A MINOR

On or about February 14, 2018, in St. Clair County, within the Southern District of Illinois,
and elsewhere,

EARL G. RICE, JR.,

defendant herein, did use a facility of interstate and foreign commerce to knowingly persuade,
induce, entice, and coerce C.J., an individual who had not attained the age of 18 years, to engage
in sexual activity for which a person could be charged with a criminal offense, that is, Aggravated
Criminal Sexual Abuse in violation of 720 ILCS 5/11-1.60(d); all in violation of Title 18, United
States Code, Section 2422(b).

COUNT 2

TRAVEL WITH INTENT TO ENGAGE IN ILLICIT SEXUAL CONDUCT

On or about February 14, 2018, in St. Clair County, Illinois, within the Southern District
of Illinois, and the State of Missouri,

EARL G. RICE, JR.

defendant herein, did knowingly travel in interstate commerce from the State of Missouri to St. Clair County, Illinois, for the purpose of engaging in illicit sexual conduct, as defined in Title 18, United States Code, Section 2423(f), with a person under 18 years of age, all in violation of Title 18, United States Code, Section 2423(b).

COUNT 3

SEXUAL EXPLOITATION OF A MINOR

On or about February 14, 2018, in St. Clair County, Illinois, within the Southern District of Illinois,

EARL G. RICE, JR.

defendant herein, did knowingly employ, use, persuade, induce, and entice a minor, C.J., to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, which visual depictions were produced using materials that had been mailed, shipped, and transported in interstate commerce; all in violation of Title 18, United States Code, Section 2251(a).

FORFEITURE ALLEGATION

Upon conviction for the offenses charged in this indictment, defendant **EARL G. RICE, JR.**, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253, any and all material that contained any images of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), and any and all property used and intended to be used in any manner or part to commit and to promote the commission of the charged offenses.

The property that is subject to forfeiture referred to in the paragraph above includes, but is not limited to, the following:

1. a Nokia Lumia 635 cellular telephone, bearing serial number

f0ed24b442e9f0e50336066ae1f20279, and


2. a Nokia 6350 cellular phone, bearing IMEI number 355969042786894.

A TRUE BILL


FOREPERSON



ANGELA SCOTT
Assistant United States Attorney



STEVEN D. WEINHOEFT
United States Attorney

Recommended Bond: Detention